

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

MDL NO. 3076

CASE NO. 1:23-MD-03076-KMM

IN RE:

FTX Cryptocurrency Exchange Collapse Litigation

THIS DOCUMENT RELATES TO:

ALL CASES

MDL PLAINTIFFS' NOTICE FOR STATUS CONFERENCE

As discussed at the November 14, 2024 Hearing, the MDL Plaintiffs are glad to inform the Court they have withdrawn, and dismissed various pleadings, as a result of the Global Mediation with the FTX Estate. MDL Plaintiffs are also grateful the Court is setting a second Status Conference with all Parties in the near future. The first FTX MDL Status Conference (held on June 7, 2023, [ECF No. 7]), helped organize all counsel, and the Court adopted Case Management Protocols, [ECF No. 23]. The Court requested a "Preliminary Report" before the first Status Conference, so MDL Plaintiffs provide now the attached Preliminary Report (**Exhibit A**), identifying many of the pending items.¹

¹ The November 14th Hearing involved issues relating solely to the settlement between the MDL and FTX Estate, and therefore this Court did not discuss any other pending items, which the Court stated would be addressed at a subsequent Status Conference. MDL Plaintiffs are glad to coordinate a proposed Agenda with all FTX Defendants, once the Court sets the date for the second Status Conference.

Dated: December 4, 2024

Respectfully submitted,

By: /s/ Adam Moskowitz

Adam M. Moskowitz
Florida Bar No. 984280
Joseph M. Kaye
Florida Bar No. 117520
THE MOSKOWITZ LAW FIRM, PLLC
Continental Plaza
3250 Mary Street, Suite 202
Coconut Grove, FL 33133
Office: (305) 740-1423
adam@moskowitz-law.com
joseph@moskowitz-law.com
service@moskowitz-law.com

Co-Lead Counsel

By: /s/ David Boies

David Boies
Alexander Boies
Brooke A. Alexander
BOIES SCHILLER FLEXNER LLP
333 Main Street
Armonk, NY 10504
914-749-8200
dboies@bsfllp.com
aboies@bsfllp.com
balexander@bsfllp.com

Co-Lead Counsel

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the forgoing was filed on December 4, 2024, via the Court's CM/ECF system, which will send notification of such filing to all attorneys of record.

By: /s/ Adam Moskowitz
Adam Moskowitz

EXHIBIT A

FTX MDL PLAINTIFFS' PRELIMINARY REPORT

1. Currently pending: MDL Plaintiffs' Supplemental Motion for Preliminary Approval of First Tranche of FTX Settlements [ECF No. 780]

Plaintiffs move unopposed to seek preliminary approval of class action settlements with certain settled FTX Promoter Defendants, in the same manner approved by Judge Altman as to certain settling defendants in *Dominik Karnas, et al. v. Mark Cuban, et al.*, Case No. 1:22-cv-22538-RKA, ECF No. 304 (S.D. Fla. June 10, 2024).

2. **Pending MDL Tracks of Litigation**

- **Banks**: Response to Amended Complaint [ECF No. 779] now due Jan. 15, 2025.
- **VC Multinational**: Response to Amended Complaint [ECF No. 783] now due Jan. 3, 2025; additional request pending [ECF No. 790].
- **Promoters**: Complaint at ECF No. 179; Pending Motions to Dismiss at 263, 265, 270, 271, 272, 274, 275, 278, Additional Promoter Complaints [ECF Nos 506, 676, 677, 678, 704] stayed pending rulings on fully briefed motions to dismiss at ECF No. 179), Wasserman and Dentsu Joint Motion to Dismiss [ECF 506]
- **Law Firms**: Fenwick Complaint at ECF No. 153; Pending Motion to Dismiss at ECF No. 276
- **Auditors**: Complaint at ECF No. 158; Pending Motion to Dismiss at ECF No. 281
- **Domestic V.C. Funds**: Complaint at ECF No. 157; Pending Motion to Dismiss at ECF No. 301
- **Insiders**: Complaint ECF No. 178; track stayed pending resolution/ FTX Estate.

3. Additional Pending Motions

- Plaintiffs' Motion Serve Certain Defendants through Alternate Means [ECF 280]
- Plaintiffs' Omnibus Motion to Lift Discovery Stay and for Leave to Conduct Jurisdictional Discovery on Sino Global Capital Limited [ECF 538]

4. Update on Defendant Global Mediations with MDL and Estate

5. Discovery Production/Hearings with Magistrate Judge Sanchez

6. Enter Second CMO: Class Certification, Expert Reports, add new Parties, etc.